

SCHEDULE C

DEFENDANTS' PROPOSED VOIR DIRE QUESTIONS

Defendants Robert L. Ecklin, Jr., individually and doing business as Ecklin Development Group¹ and Dennis Schopf respectfully request that the following questions be asked of potential jurors on voir dire:

1. Are you related to or do you know the Plaintiff, Chevelle Tingen?
2. Are you related to or do you know the Plaintiff's attorney, Nina Shapiro?
3. Are you related to or do you know Defendant Robert Ecklin?
4. Are you related to or do you know Defendant Dennis Schopf?
5. Are you related to or do you know Maribel Valez?
6. Are you related to or do you know Charlene Kulesa?
7. Are you related to or do you know Zulma Cora?
8. Are you related to or do you know Mark McCardle?
9. Are you related to or do you know Dr. Philip Taylor?
10. Are you related to or do you know Dr. Jerome Gottlieb?
11. Have you, or anyone close to you, ever worked for Ecklin Group?
12. Are you related or do you know the Defendants' attorneys, Gary Melchionni and Joseph D. Shelby?
13. Have you ever been represented in a proceeding by the law firm of Stevens & Lee?
14. Have you ever been a party in a proceeding where the other side was represented by the law firm of Stevens & Lee?
15. Are you employed? If so, what is the name of your employer?

16. What are your job duties?
17. Are you retired?
18. Are you laid off?
19. What is your educational background?
20. Are you married? If so, what is your spouse's occupation and who is your spouse's employer?
21. Do you have any children? What are their ages? If old enough to work, what is their occupation and for whom do they work?
22. Do you own your own home?
23. What magazines or periodicals do you enjoy reading?
24. Have you ever written a letter to the editor of a magazine or newspaper? If so, what was the content?
25. Have you ever been the owner or partial owner of a business?
26. Have you ever been a juror before? If so, what type of case was it? Were you the foreperson? Did that experience affect your view of the legal system? If so, explain.
27. Have you or any member of your family ever been a party in a criminal case or civil lawsuit? If so, what type of case were you or your family member a party in? Where you the plaintiff or the defendant?
28. Some people believe that just because a lawsuit has been brought, the defendant is probably liable for something. Do any of you agree with that?

¹ No such entity as Ecklin Development Group exists. Ecklin Group is a sole proprietorship and Ecklin Development, LLC is a Pennsylvania Limited Liability Company.

29. In this case the plaintiff is an individual who is suing a corporation. Do any of you hold any attitudes or beliefs about companies or corporations that might interfere with your ability to be a fair and impartial juror in this case?

30. Will the fact that the plaintiff is an individual and the defendant is a company affect your judgment in this trial?

31. Would you have a tendency to find against the defendant just because it is an employer?

32. Would you have a tendency to award the plaintiff damages in this case just because you think the defendants can pay them?

33. Assuming you determine plaintiff was entitled to damages, would you have a tendency to award plaintiff more damages in this case than what you think she is entitled to just because you think the defendants can pay them?

34. The judge will instruct you that under the law individuals and corporations are equal and the same laws apply to both. Will you follow these instructions and judge both parties according to the same legal standards?

35. The judge will also instruct you that under the law you should decide this case on the law and the facts as you find them and not on any sympathy you may feel for the plaintiff. Will you be able to follow this instruction?

36. Have you, or anyone close to you, ever filed a charge or complaint of discrimination of any kind with your employer or any government agency?

37. Have you, or anyone close to you, ever filed a grievance or a charge of discrimination against an employer?

38. Have you, or anyone close to you, ever been involved in any way with a lawsuit that charged discrimination?

39. Have you, or anyone close to you, ever been accused of discrimination or treating someone else unfairly because of their age, race, sex, ancestry, national origin, or disability?

40. Have you ever been employed by a company that was accused of discrimination?

41. Have you ever been employed by, served voluntarily on, or been appointed to any commissions, task forces, study groups or agencies on human relations, civil rights, minority or women's issues?

42. Are you a member of any organization or club or group that is concerned with issues related to employment or related to civil lawsuits?

43. Have you, or anyone close to you, had any education, training or work experience in the field of human resources or personnel management?

44. Have you ever witnessed any job discrimination or harassment based on age, race, national origin, religion, sex or disability? If so, explain.

45. Have you ever experienced any discrimination or harassment based on age, race, national origin, religion, sex or disability? If so, explain.

46. Do any of you have any strong feelings or any experiences that might interfere with your ability to be a fair and impartial juror?

